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IN THE UNITED STATES DISTRICT COURT DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

EB STITLES OF THATEIRET

Plaintiff,

v.

AARON MICHAEL SHAMO,

Defendant.

Case No. 2:16-cr-631 DAK

UNITED STATES' PROPOSED SPECIAL VERDICT FORM

Judge Dale A. Kimball

The United States of America, by and through Michael Gadd, Special Assistant United States Attorney, hereby requests the Court present the jury with the following proposed Special Verdict Form. To date, the defense has not signaled its objection to this form.

Respectfully Submitted,
JOHN W. HUBER
United States Attorney

/s/ Michael Gadd

MICHAEL GADD

Special Assistant United States Attorney

		TES DISTRICT COURT TAH, CENTRAL DIVISION
UNITED STATES OF	AMERICA,	SPECIAL VERDICT FORM
Plaintiff, v.		Case No. 2:16-cr-631 DAK
AARON MICHAEL SI	HAMO,	District Judge Dale A. Kimball
Defendant.		
SHAMO: Count 1—Engaging in a	Continuing Crimina	
1. We, the jury duly impan MICHAEL SHAMO:	eled in the above-enti	tled case, find the defendant AARON
□ NOT GUILTY □	GUILTY as to Count	1 of the Indictment.
-		, do not answer questions 1a, 1b, and 1c. If you swer questions 1a, 1b, and 1c.
States proved beyond a rea	sonable doubt that the	1, do you also unanimously find that the United amount of controlled substance attributable to ture or substance containing a detectable amount
Proven Not	Proven	
_	sonable doubt that the	1, do you also unanimously find that the United e defendant was a principal administrator,
Proven Not	Proven	

1c. Please indicate by checking the box for each alleged underlying violation below whether you unanimously find the United States proved the defendant committed the violation beyond a reasonable doubt.

The List of Underlying Violations

<u>.</u> .	Resulting in Death of R.K., all in violation of Title 21, (a)(1) and 846, and Title 18, United States Code, Section 2;
Proven	Not Proven
- ·	olam, all in violation of Title 21, United States Code, Title 18, United States Code, Section 2;
Proven	Not Proven
The violation alleged in Count 2, Substance;	Aiding and Abetting the Importation of a Controlled
Proven	Not Proven
The violation alleged in Count 3, Substance;	Aiding and Abetting the Importation of a Controlled
Proven	Not Proven
The violation alleged in Count 4, Substance;	Aiding and Abetting the Importation of a Controlled
Proven	Not Proven
The violation alleged in Count 5,	Possession of Fentanyl with Intent to Distribute;
Proven	Not Proven
The violation alleged in Count 6, in Death;	Aiding and Abetting the Distribution of Fentanyl Resulting
Proven	Not Proven
The violation alleged in Count 7,	Manufacture of Alprazolam;
Proven	Not Proven

The violation alleged in	Count 10, U	Jse of the U.S	. Mail in Furth	erance of a Drug	g Trafficking
Offense;					

Aiding and Abetting the Attempted Distribution of a Controlled Substance, namely Fentanyl, on or about the following dates to the following addressees, each in violation of Title 21, United States Code, Sections 841(a)(1) and 846, and Title 18, United States Code, Section 2:

Proven Not Proven

Proven	Not	Date	Addressee Initials	State	Number of Pills	Controlled Substance	Markings
		11/18/2016	R.L.	MA	20,000	Fentanyl	A 215
		11/18/2016	J.H.	ОН	2,000	Fentanyl	A 215
		11/18/2016	B.W.	AL	2,000	Fentanyl	A 215
		11/18/2016	Y.C.	ОН	1,100	Fentanyl	A 215
		11/18/2016	N.L.	NJ	1,000	Fentanyl	A 215
		11/18/2016	D.A.	NJ	1,000	Fentanyl	A 215
		11/18/2016	F.C.	AK	1,000	Fentanyl	A 215
		11/18/2016	P.T.A.C.	MD	1,000	Fentanyl	M/30
		11/18/2016	L.S.	MN	1,000	Fentanyl	M/30
		11/18/2016	V.R.	WA	1,000	Fentanyl	A 215
		11/18/2016	S.W.	NC	1,000	Fentanyl	A 215
		11/18/2016	G.M.	NV	500	Fentanyl	A 215
		11/18/2016	L.F.	PA	500	Fentanyl	M/30
		11/18/2016	S.R.	WA	200	Fentanyl	M/30
		11/18/2016	R.B.	ОН	150	Fentanyl	A 215
		11/18/2016	D.P.	MA	150	Fentanyl	A 215

Proven	Not	Date	Addressee Initials	State	Number of Pills	Controlled Substance	Markings
		11/18/2016	CBS.I., M.W.	KS	100	Fentanyl	A 215
		11/18/2016	M.J.	KY	100	Fentanyl	A 215
		11/18/2016	P.F.	IL	100	Fentanyl	A 215
		11/18/2016	J.P.	PA	100	Fentanyl	A 215
		11/18/2016	M.S.	NC	100	Fentanyl	A 215
		11/18/2016	F.O.	LA	100	Fentanyl	M/30
		11/18/2016	M.L.	NC	100	Fentanyl	A 215
		11/18/2016	T.M.	CT	60	Fentanyl	M/30
		11/18/2016	J.T.	OR	50	Fentanyl	M/30
		11/18/2016	A.M.	MT	40	Fentanyl	M/30
		11/18/2016	D.L.G.	MT	40	Fentanyl	A 215
		11/18/2016	M.M.	NY	30	Fentanyl	M/30
		11/18/2016	J.M.L.	MD	27	Fentanyl	A 215
		11/18/2016	J.M.	IL	22	Fentanyl	M/30
		11/18/2016	A.B.	CO	20	Fentanyl	M/30
		11/18/2016	A.G.	KY	20	Fentanyl	A 215
		11/18/2016	M.P.	MN	16	Fentanyl	A 215
		11/18/2016	J.T.	OR	14	Fentanyl	M/30
		11/18/2016	A.T.	VA	12	Fentanyl	M/30
		11/18/2016	T.E.	SC	12	Fentanyl	M/30
		11/18/2016	N.A.	CA	12	Fentanyl	A 215

Proven	Not	Date	Addressee Initials	State	Number of Pills	Controlled Substance	Markings
		11/18/2016	C.	PA	11	Fentanyl	M/30
		11/18/2016	K.M.T.T.S.T.R.	OK	11	Fentanyl	M/30
		11/18/2016	K.M.H.	SC	11	Fentanyl	M/30
		11/18/2016	L.P.	NY	11	Fentanyl	M/30
		11/18/2016	B.S.	ОН	11	Fentanyl	A 215
		11/18/2016	R.P.	PA	11	Fentanyl	A 215
		11/18/2016	A.B.	МО	11	Fentanyl	M/30
		11/18/2016	J.G.	NY	11	Fentanyl	M/30
		11/18/2016	M.J.	CA	11	Fentanyl	M/30
		11/18/2016	J.S.	PA	11	Fentanyl	A 215
		11/18/2016	S.F.	PA	11	Fentanyl	A 215
		11/18/2016	G.T.	TX	11	Fentanyl	M/30
		11/18/2016	J.R.	CT	11	Fentanyl	A 215
		11/18/2016	M.D.	NJ	10	Fentanyl	A 215
		11/18/2016	B.B.	СО	10	Fentanyl	A 215
		11/20/2016	A.W.	WA	5,000	Fentanyl	M/30
		11/20/2016	Y.C.	ОН	1,100	Fentanyl	A 215
		11/20/2016	J.R.	MN	1,000	Fentanyl	M/30
		11/20/2016	A.P.	KY	1,000	Fentanyl	A 215
		11/20/2016	D.R.	DE	500	Fentanyl	M/30
		11/20/2016	L.R.T.A.S.	NJ	500	Fentanyl	A 215

Proven	Not	Date	Addressee Initials	State	Number of Pills	Controlled Substance	Markings
		11/20/2016	A.M.	MN	500	Fentanyl	A 215
		11/20/2016	M.C.	SC	200	Fentanyl	A 215
		11/20/2016	T.J.	FL	200	Fentanyl	A 215
		11/20/2016	M.S.	NC	200	Fentanyl	M/30
		11/20/2016	G.D.	VA	150	Fentanyl	A 215
		11/20/2016	A.H.	PA	100	Fentanyl	A 215
		11/20/2016	J.R.	NC	100	Fentanyl	A 215
		11/20/2016	C.D.	MA	100	Fentanyl	A 215
		11/20/2016	A.H.	VA	100	Fentanyl	A 215
		11/20/2016	N.M.	ME	100	Fentanyl	A 215
		11/20/2016	N.Y.	MI	100	Fentanyl	A 215
		11/20/2016	M.J.	KY	100	Fentanyl	A 215
		11/20/2016	D.L.	FL	100	Fentanyl	M/30
		11/20/2016	J.B.	TX	100	Fentanyl	M/30
		11/20/2016	A.W.	TX	13	Fentanyl	M/30

The List of Underlying Violations, cont.

Aiding and Abetting the Attempted Distribution of a Controlled Substance, namely Alprazolam, on or about the following dates to the following addressees, each in violation of Title 21, United States Code, Sections 841(a)(1) and 846, and Title 18, United States Code, Section 2:

			Addusassa		Name how	Controlled	
Proven	Not	Date	Addressee Initials	State	Number of Pills	Controlled Substance	Markings
		11/18/2016	W.R.	WA	10,000	Alprazolam	GG 249
		11/18/2016	H.W.	NJ	10,000	Alprazolam	GG 249
		11/18/2016	A.W.	NY	5,000	Alprazolam	GG 249
		11/18/2016	A.M.	CA	5,000	Alprazolam	GG 249
		11/18/2016	C.R.	WV	2,000	Alprazolam	GG 249
		11/18/2016	R.L.	FL	2,000	Alprazolam	GG 249
		11/18/2016	J.L.	CA	2,000	Alprazolam	GG 249
		11/18/2016	B.J.	LA	2,000	Alprazolam	GG 249
		11/18/2016	L.	NY	2,000	Alprazolam	GG 249
		11/18/2016	A.K.	WI	2,000	Alprazolam	GG 249
		11/18/2016	J.B.	TX	1,000	Alprazolam	GG 249
		11/18/2016	A.F.	GA	200	Alprazolam	GG 249
		11/18/2016	S.W.	NC	100	Alprazolam	GG 249
		11/18/2016	P.H.	PA	100	Alprazolam	GG 249
		11/18/2016	J.T.	OR	100	Alprazolam	GG 249
		11/18/2016	A.S.	TX	100	Alprazolam	GG 249
		11/18/2016	R.K.	NC	100	Alprazolam	GG 249

Proven	Not	Date	Addressee Initials	State	Number of Pills	Controlled Substance	Markings
		11/18/2016	D.C.	IL	100	Alprazolam	GG 249
		11/18/2016	R.T.	TN	100	Alprazolam	GG 249
		11/18/2016	F.W.	NC	100	Alprazolam	GG 249
		11/18/2016	D.C.	IL	100	Alprazolam	GG 249
		11/18/2016	R.T.	TN	100	Alprazolam	GG 249
		11/18/2016	F.W.	NC	100	Alprazolam	GG 249
		11/18/2016	X.C.	ОН	100	Alprazolam	GG 249
		11/18/2016	D.H.	FL	50	Alprazolam	GG 249
		11/20/2016	N.K.	MA	2,000	Alprazolam	GG 249
		11/20/2016	G.R.	TX	2,000	Alprazolam	GG 249
		11/20/2016	J.O.	SC	2,000	Alprazolam	GG 249
		11/20/2016	C.L.	OR	2,000	Alprazolam	GG 249
		11/20/2016	Mrs. L.	MI	1,000	Alprazolam	GG 249
		11/20/2016	A.S.	NC	1,000	Alprazolam	GG 249
		11/20/2016	J.H.	TN	1,000	Alprazolam	GG 249
		11/20/2016	Y.C.	ОН	500	Alprazolam	GG 249
		11/20/2016	J.S.	MI	200	Alprazolam	GG 249
		11/20/2016	N.H.	SC	100	Alprazolam	GG 249
		11/20/2016	C.S.	TN	100	Alprazolam	GG 249
		11/20/2016	J.H.	LA	100	Alprazolam	GG 249
		11/20/2016	D.C.	IL	100	Alprazolam	GG 249

Proven Not	Date	Addressee Initials	State	Number of Pills	Controlled Substance	Markings
	11/20/2016	S.S.	GA	100	Alprazolam	GG 249
	11/20/2016	A.L.	CA	100	Alprazolam	GG 249
	11/20/2016	D.L.	SC	100	Alprazolam	GG 249
	11/20/2016	P.O.	GA	100	Alprazolam	GG 249
	11/20/2016	Z.W.	NY	100	Alprazolam	GG 249
	11/20/2016	C.G.	MS	100	Alprazolam	GG 249

The List of Underlying Violations, cont.

Aiding and Abetting the Use of the U.S. Mail in Furtherance of a Drug Trafficking Offense on the following dates by delivering packages to the post office addressed to the following addressees, containing the following controlled substances, each in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2:

Proven	Not	Date	Addressee Initials	State	Number of Pills	Controlled Substance	Markings
		11/22/2016	M.E.	SD	5,000	Fentanyl	M/30
		11/22/2016	E.J.	NC	5,000	Fentanyl	M/30
		11/22/2016	K.V.	NJ	2,000	Fentanyl	A 215
		11/22/2016	Mr. McG.	WA	1,000	Fentanyl	Mixed
		11/22/2016	E.S.	NC	500	Fentanyl	M/30
		11/22/2016	R.W.	SC	500	Fentanyl	A 215
		11/22/2016	G.V.	VA	100	Fentanyl	M/30
		11/22/2016	E.B.	CT	100	Fentanyl	A 215
		11/22/2016	M.T.	IL	100	Fentanyl	M/30
		11/22/2016	B.F.	ND	100	Fentanyl	M/30
		11/22/2016	C.S.	CO	50	Fentanyl	M/30
		11/22/2016	S.H.	ОН	50	Fentanyl	M/30
		11/22/2016	B.M.	AL	50,000	Alprazolam	GG 249
		11/22/2016	J.S.	CA	50,000	Alprazolam	GG 249
		11/22/2016	T.G.	NC	20,000	Alprazolam	GG 249
		11/22/2016	M.D.	CA	2,000	Alprazolam	GG 249
		11/22/2016	M.T.	VA	2,000	Alprazolam	GG 249
		11/22/2016	T.D.	IL	100	Alprazolam	GG 249

The List of Underlying Violations, cont.

Aiding and Abetting the Attempted Distribution of a Controlled Substance, namely Fentanyl, on or about November 20, 2016, to J.G., aka "trustworthymoney," through A.L., all in violation of Title 21, United States Code, Sections 841(a)(1) and 846, and Title 18, United States Code, Section 2;
Aiding and Abetting the Distribution of Fentanyl on or about April 6, 2016, to E.B., all in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2;
Aiding and Abetting the Distribution of Fentanyl on or about March 3, 2016, to C.V., all in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2; and
Aiding and Abetting the Distribution of Fentanyl on or about August 3, 2016, to G.K., all in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Count 2—Aiding and Abetting the Importation of Fentanyl

2. We, the jury duly impaneled in the above-entitled case, find the defendant AARON MICHAEL SHAMO: GUILTY as to Count 2 of the Indictment. ☐ NOT GUILTY If you found the defendant not guilty of Count 2, do not answer question 2a. If you found the defendant guilty of Count 2, please answer question 2a: 2a. Having found the defendant guilty of Count 2, do you also unanimously find that the United States proved beyond a reasonable doubt that the amount of controlled substance attributable to the defendant was at least 40 grams of a mixture or substance containing a detectable amount of Fentanyl? Proven Not Proven \square **Count 3—Aiding and Abetting the Importation of Alprazolam** 3. We, the jury duly impaneled in the above-entitled case, find the defendant AARON MICHAEL SHAMO: ☐ GUILTY as to Count 3 of the Indictment. ☐ NOT GUILTY Count 4—Aiding and Abetting the Importation of Fentanyl 4. We, the jury duly impaneled in the above-entitled case, find the defendant AARON MICHAEL SHAMO: ☐ NOT GUILTY ☐ GUILTY as to Count 4 of the Indictment. If you found the defendant not guilty of Count 4, do not answer question 4a. If you found the defendant guilty of Count 4, please answer question 4a: 4a. Having found the defendant guilty of Count 4, do you also unanimously find that the United States proved beyond a reasonable doubt that the amount of controlled substance attributable to the defendant was at least 40 grams of a mixture or substance containing a detectable amount of Fentanyl? Not Proven Proven

Count 5—Possession of Fentanyl with Intent to Distribute 5. We, the jury duly impaneled in the above-entitled case, find the defendant AARON MICHAEL SHAMO: ☐ GUILTY as to Count 5 of the Indictment. □ NOT GUILTY If you found the defendant not guilty of Count 5, do not answer question 5a. If you found the defendant guilty of Count 5, please answer question 5a: 5a. Having found the defendant guilty of Count 5, do you also unanimously find that the United States proved beyond a reasonable doubt that the amount of controlled substance attributable to the defendant was at least 400 grams of a mixture or substance containing a detectable amount of Fentanyl? Proven Not Proven **Count 6—Distribution of Fentanyl that Resulted in Death** 6. We, the jury duly impaneled in the above-entitled case, find the defendant AARON MICHAEL SHAMO: ☐ NOT GUILTY GUILTY as to Count 6 of the Indictment. **Count 7—Manufacture of Alprazolam** 7. We, the jury duly impaneled in the above-entitled case, find the defendant AARON MICHAEL SHAMO: ☐ GUILTY as to Count 7 of the Indictment. ☐ NOT GUILTY **Count 8—Adulteration of Drugs** 8. We, the jury duly impaneled in the above-entitled case, find the defendant AARON MICHAEL SHAMO: ☐ NOT GUILTY ☐ GUILTY as to Count 8 of the Indictment.

Count 9—Adulteration of Drugs
9. We, the jury duly impaneled in the above-entitled case, find the defendant AARON MICHAEL SHAMO:
□ NOT GUILTY □ GUILTY as to Count 9 of the Indictment.
Count 10—Use of the U.S. Mail in furtherance of a Drug Trafficking Offense
10. We, the jury duly impaneled in the above-entitled case, find the defendant AARON MICHAEL SHAMO:
□ NOT GUILTY □ GUILTY as to Count 10 of the Indictment.
Count 11—Conspiracy to Commit Money Laundering
11. We, the jury duly impaneled in the above-entitled case, find the defendant AARON MICHAEL SHAMO:
□ NOT GUILTY □ GUILTY as to Count 11 of the Indictment.
Count 12—Money Laundering Promotion or Concealment
12. We, the jury duly impaneled in the above-entitled case, find the defendant AARON MICHAEL SHAMO:
□ NOT GUILTY □ GUILTY as to Count 12 of the Indictment.
Count 13—Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity
13. We, the jury duly impaneled in the above-entitled case, find the defendant AARON MICHAEL SHAMO:
□ NOT GUILTY □ GUILTY as to Count 13 of the Indictment.
DATED this day of September, 2019.
FOREPERSON